



GE  
159 Plastics Avenue  
Pittsfield, MA 01201  
USA

*Transmitted Via Overnight Courier*

November 2, 2005

Mr. William P. Lovely, Jr. (MC HBO)  
USEPA – New England  
One Congress Street, Suite 1100  
Boston, Massachusetts 02114-2023

**Re: GE-Pittsfield/Housatonic River Site  
Former Oxbow Areas A and C (GECD410)  
Supplemental Sampling Plan**

Dear Mr. Lovely:

In January 2005, the General Electric Company (GE) submitted a *Conceptual Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Conceptual RD/RA Work Plan). For the properties or averaging areas at the Former Oxbow Areas A and C Removal Action Area (RAA), all of which are non-residential, that work plan evaluated whether the existing concentrations of polychlorinated biphenyls (PCBs) and (where relevant) other constituents in the soil would meet the soil-related Performance Standards set forth in the Consent Decree (CD) and *Statement of Work for Removal Actions Outside the River* (SOW) for the relevant type of non-residential property or averaging area (i.e., commercial or recreational). Where existing conditions would not meet those standards, the Conceptual RD/RA Work Plan proposed soil removal/replacement actions to achieve those standards. With U.S. Environmental Protection Agency (EPA) approval, two of these properties, Parcels I8-23-4 and I8-23-5, are included in this RAA solely for purposes of addressing PCBs. Hence, for these parcels, the Conceptual RD/RA Work Plan evaluated the need for remediation to address PCBs only.

The Conceptual RD/RA Work Plan was conditionally approved by EPA on April 6, 2005. Subsequently, on July 5, 2005, GE submitted a *Final Removal Design/Removal Action Work Plan for Former Oxbow Areas A and C* (Final RD/RA Work Plan), which provided additional details regarding the proposed remediation to achieve those standards. EPA conditionally approved that work plan on August 30, 2005. As required by that conditional approval letter, GE submitted an Addendum to the Final RD/RA Work Plan on September 26, 2005.

Since that time, based on further review of the available soils data, GE has determined that certain properties within this RAA may already meet the soil-related Performance Standards that would apply to residential properties or could potentially achieve those standards with relatively small modifications to the RD/RA work plans. Achieving the Performance Standards for residential use at such properties would avoid the need to obtain a Grant of Environmental Restriction and Easement (ERE) or to implement a Conditional Solution at those properties. However, the application of the residential Performance Standards to these non-residential properties requires additional grid sampling for PCBs consistent with the requirements for residential properties at the Former Oxbow Areas under the SOW. Accordingly, to evaluate whether such properties may already meet the residential Performance Standards and, if not, the extent of remediation necessary to do so, GE is submitting this supplemental sampling plan for certain properties within the RAA.

This supplemental sampling plan pertains to the following properties within this RAA (shown on Figure 1):

- Parcel I8-23-4 (included in this RAA solely to address PCBs);
- Parcel I8-23-5 (included in this RAA solely to address PCBs); and
- Parcel I8-23-9.

For these properties, GE proposes to conduct supplemental sampling so as to allow an evaluation of whether existing soil conditions meet the residential Performance Standards (for PCBs only, for Parcels I8-23-4 and I8-23-5). If not, these additional data would support possible evaluations by GE concerning the extent of soil removal that would be necessary to achieve those standards. The SOW requires PCB sampling of residential properties at the Former Oxbow Areas on a 25-foot grid for the top foot of soil and a 50-foot grid for soil deeper than one foot (SOW, Technical Attachment D, p. 7). Accordingly, such grids have been superimposed on the above-listed properties, starting with the grids previously used in the pre-design investigation of this RAA. These grids are shown on Figure 2.

Although the SOW states that samples from the top foot at residential properties should be collected from the 0- to 0.5-foot and 0.5 to 1-foot depth intervals, EPA has approved an alternative sampling approach for the residential properties at Former Oxbow Areas J and K, under which surface samples were collected from the 0- to 1-foot depth increment. Applying that same approach here, GE proposes to collect samples from the 0- to 1-foot depth increment at all of the 25-foot grid nodes on the above-listed properties where such surface samples were not previously collected. These additional sampling locations are identified on Figure 2. These samples will be submitted for PCB analysis.

In addition, GE proposes to advance soil borings on the 50-foot grid nodes on these properties where borings were not previously advanced for the collection of subsurface samples. These additional soil boring locations are also shown on Figure 2. At each of these boring locations, in addition to the collection of surface samples from the 0- to 1-foot depth increment (at locations where surface samples were not previously collected), subsurface samples will be collected, beginning at one foot below the ground surface (bgs), to a depth of 15 feet. Although the SOW states that subsurface samples at residential properties should be collected in two-foot depth intervals, GE proposes, for these particular properties, to collect the subsurface samples from depth increments of 1 to 3 feet, 3 to 6 feet, 6 to 10 feet, and 10 to 15 feet for two reasons: (1) for consistency with the existing subsurface pre-design PCB data from these properties (which were generally collected in those depth increments); and (2) because the existing subsurface PCB data from these properties show very low PCB concentrations, averaging less than 1 ppm at each property. These samples will be submitted for PCB analysis except for the 6- to 10-foot and 10- to-15-foot samples from Parcels I8-23-4 and I8-23-5. At those parcels, the existing PCB data do not show detected PCBs at depths below 6 feet. Hence, the 6- to 10-foot and 10- to-15-foot samples from these properties will be held at the laboratory and will be analyzed for PCBs iteratively if the samples from the depth increment above them show detected PCBs. For each property, for purposes of applying the residential Performance Standard of 2 ppm, all the existing and new PCB data from depth increments from one foot bgs to the depth at which PCBs are detected will be averaged, using the spatial averaging procedures specified in the SOW, to determine the average PCB concentration in the 1- to X-foot depth increment, where X equals the depth at which PCB were detected at that property.

With respect to the non-PCB constituents listed in Appendix IX of 40 CFR Part 264 (excluding pesticides and herbicides) plus three additional constituents – benzidine, 2-chloroethyl vinyl ether, and 1,2-diphenylhydrazine (Appendix IX+3), there is no need for such data at Parcels I8-23-4 and I8-23-5, since those properties are included in this RAA solely to address PCBs. For Parcel I8-23-9, the existing non-PCB Appendix IX+3 data are sufficient to meet the applicable requirement in the SOW for sampling residential properties at the Former Oxbow Areas, which calls for the analysis of a minimum of three

Appendix IX+3 samples per property. Hence, no additional general characterization sampling for non-PCB constituents is necessary at this property to meet the SOW's sampling requirement for residential properties.

GE has also reviewed the existing Appendix IX+3 data from Parcel I8-23-9 to determine whether there are specific data needs to support the evaluation of whether this property would meet the Performance Standards for residential properties. For this property, GE has: (a) compared the maximum concentrations of dioxin Toxicity Equivalency Quotients (TEQs) in the 0- to 1-foot and 1- to 15-foot depth increments to the CD's Performance Standard for such TEQs at residential areas (1 ppb); and (b) compared the average concentrations of the other non-PCB constituents (which were not screened out) in each of those depth increments to the "Wave 2" Method 1 S-1 soil standards proposed by the Massachusetts Department of Environmental Protection (MDEP) in September 2004 (as modified in May 2005), which are expected to be finalized prior to the performance of the remediation at this RAA. Based on that review, GE has not identified any specific non-PCB data needs at Parcel I8-23-9.

Following receipt of EPA approval of this supplemental sampling plan, GE proposes to conduct the supplemental PCB sampling described above, and to submit a Second Addendum to the Final RD/RA Work Plan, which will: (a) report the results of that supplemental sampling; (b) identify those non-residential properties where GE proposes to achieve the Performance Standards for residential properties; (c) for such properties that would meet those standards without additional remediation, demonstrate such achievement; and (d) for such properties where GE elects to perform additional soil removal to achieve those standards, propose the horizontal and vertical limits of such removal and demonstrate that that additional remediation would result in achievement of residential standards. GE proposes to complete the supplemental sampling and to submit that Second Addendum within three months after EPA approval of this supplemental sampling plan (subject to delays occasioned by winter weather conditions).

Please call me if you have any questions or comments regarding this proposal.

Sincerely,

*Richard W. Gates, DAT*

Richard W. Gates  
Remediation Project Manager

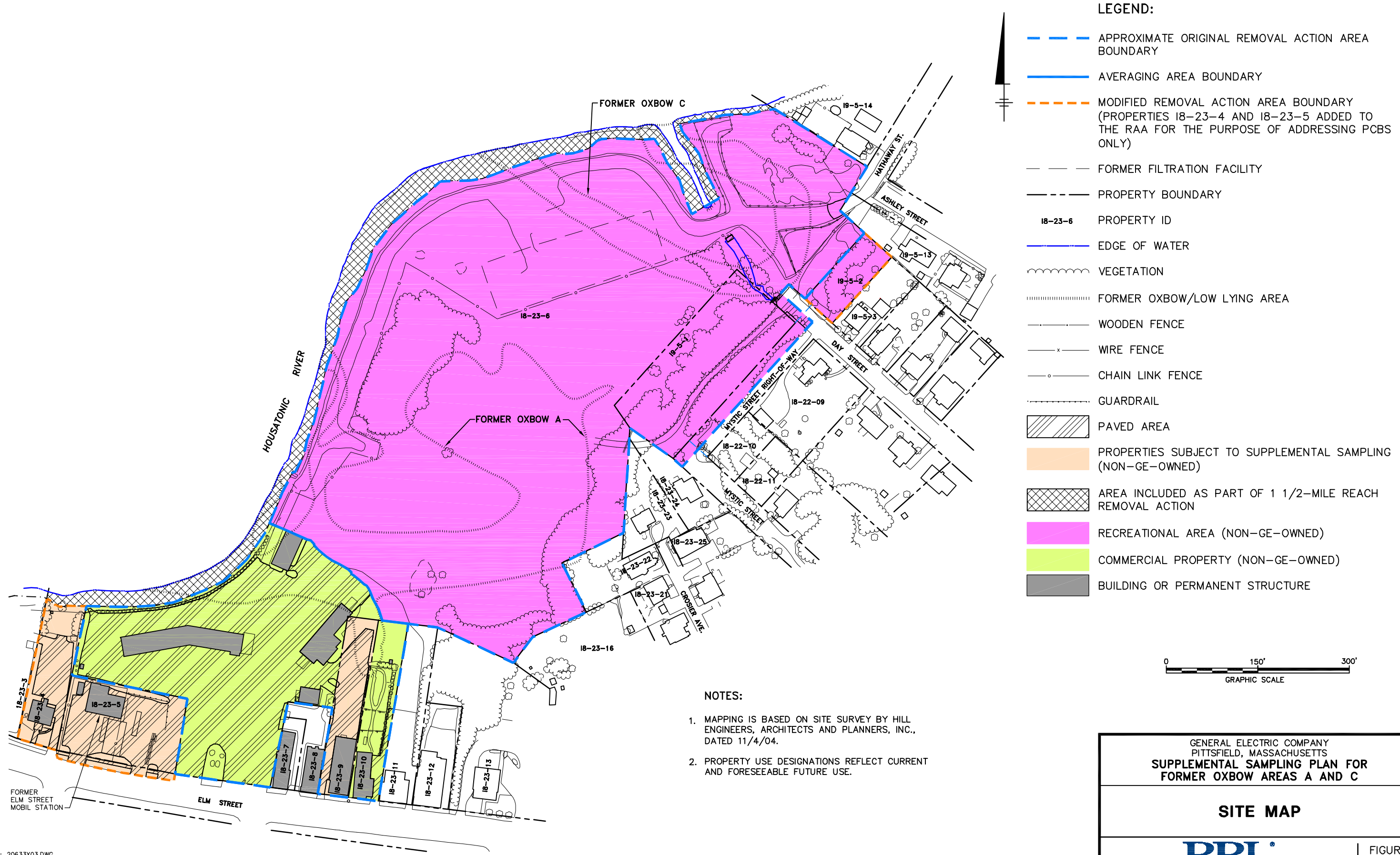
Attachments

V:\GE\_Pittsfield\_CD\_Former\_Oxbow\_Areas\_A\_and\_C\Reports and Presentations\Supplemental Sampling\65752196Ltr.doc

cc: Dean Tagliaferro, EPA  
Tim Conway, EPA  
John Kilborn, EPA  
Holly Inglis, EPA  
Rose Howell, EPA\*  
Linda Palmieri, Weston  
K.C. Mitkevicius, USACE  
Susan Steenstrup, MDEP (2 copies)  
Anna Symington, MDEP\*  
Robert Bell, MDEP\*  
Thomas Angus, MDEP\*  
Nancy E. Harper, MA AG\*  
Dale Young, MA EOE\*  
Mayor James Ruberto, City of Pittsfield\*

Michael Carroll, GE\*  
Andrew Silber, GE  
Rod McLaren, GE\*  
James Nuss, BBL  
James Bieke, Goodwin Procter LLP  
Property Owner – Parcel I8-23-4  
Property Owner – Parcel I8-23-5  
Property Owner – Parcel I8-23-9  
David J. Baker, ExxonMobil  
George W. Crimmins, III, Esq., McCusker,  
Anselmi, Rosen, Carvelli & Walsh  
Public Information Repositories  
GE Internal Repository

\* without attachments



- NOTES:
1. MAPPING IS BASED ON SITE SURVEY BY HILL ENGINEERS, ARCHITECTS AND PLANNERS, INC., DATED 11/4/04.
  2. PROPERTY USE DESIGNATIONS REFLECT CURRENT AND FORESEEABLE FUTURE USE.

GENERAL ELECTRIC COMPANY  
PITTSFIELD, MASSACHUSETTS  
**SUPPLEMENTAL SAMPLING PLAN FOR  
FORMER OXBOW AREAS A AND C**

**SITE MAP**





